

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY**

ADAM X., BRIAN Y., CASEY Z., on
behalf of themselves and all others
situated, and the AMERICAN CIVIL
LIBERTIES UNION OF NEW
JERSEY, and the ARC OF NEW
JERSEY,

Plaintiffs,

v.

NEW JERSEY DEPARTMENT OF
CORRECTIONS, VICTORIA KUHN,
in her official capacity as Acting
Commissioner of the New Jersey
Department of Corrections, NEW
JERSEY DEPARTMENT OF
EDUCATION, and ANGELICA
ALLEN-McMILLAN, in her official
capacity as Acting Commissioner of the
New Jersey Department of Education,

Defendants.

Civil Action No.: 3:17-cv-00188-
FLW-LHG

**NOTICE OF MOTION AND
MOTION FOR FINAL
APPROVAL OF SETTLEMENT
AGREEMENT AND AWARD OF
ATTORNEYS' FEES AND COSTS**

PLEASE TAKE NOTICE that Plaintiffs hereby move this Court for an order granting final approval of the Settlement Agreement and awarding the negotiated \$975,000 in attorneys' fees and costs to Class Counsel.

This Motion is based upon this Notice and Motion; the accompanying Memorandum of Law; the accompanying declarations of Tess Borden and Rebecca Rodgers and all supporting exhibits; the declaration of Michael Vomacka, filed

separately; all pleadings and other documents on file in this action; and all matters of which the Court may or must take judicial notice.

Dated: February 9, 2022

Respectfully submitted,

s/ Tess Borden

Tess Borden

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Jeanne LoCicero

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**AMERICAN CIVIL LIBERTIES
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**Admitted Pro Hac Vice*